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BRIAN H. GETZ (State Bar No. 85593) Law Offices of Brian H. Getz 44 Montgomery Street, Suite 3850 San Francisco, California 94104 Telephone: (415) 956-5886 Facsimile: (415) 438-2655 OSFED 17 AM 11: 20
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Attorneys for Defendant SANDY RU ZHONG

RICHARD W. WIEKING BERNK US BISTHIET BOHRT BRITIERN BISTRIET OF CALIFORNIA

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No.: CR 05-00123 MHP
Plaintiff,) APPLICATION FOR TRAVEL ORDER) BY DEFENDANT SANDY RU ZHONG
vs.	
SANDY RU ZHONG,	
Defendant.)
))

The parties stipulate to and request a court order permitting defendant Sandy Zhong to travel to Los Angeles, California, from Saturday, March 4, 2006 until Monday, March 6, 2006 for the purpose of attending a Continuing Education Seminar on March 5, 2006 from 8:00-4:00pm at the Sportsman's Lodge in Studio City, CA. A copy of the Continuing Education Seminar announcement is attached hereto as Exhibit A. Ms. Zhong is attending this class in connection with her employment as a driving instructor. Pre-Trial Services and Assistant United States Attorney, Edward Torpoco, have been made aware of this request and have no objections. Ms. Zhong will be traveling by automobile leaving San Francisco on March 4 and returning on March 6 in the evening.

In support of this Application, the undersigned declares:

1. I am an attorney at law duly licensed to practice before this Court and in all the Courts of this State, and currently I am the attorney of record for defendant, Sandy Zhong.

- 2. I make this declaration of my own personal knowledge and if called upon to do so, I could and would testify competently to the facts as stated herein.
- 3. Defendant Zhong is prohibited from traveling outside the Northern District of California by the terms of the Pretrial Release Order.
- 4. Ms. Zhong requests permission to travel to Los Angeles, California from Saturday, March 4, 2006 until Monday, March 6, 2006 to attend a Continuing Education Seminar on Sunday, March 5, 2006 from 8:00 a.m. to 4:30 p.m. in connection with her employment as a driving instructor.
- 5. I have spoken to United States Pre-Trial Services and the U.S. Attorneys' Office, and there are no objections concerning these travel dates.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and executed at San Francisco, California, on February 15, 2006.

BRIAN H GETZ
Attorney for Defendant
SANDY RU ZHONG

The United States stipulates to permitting Ms. Zhong to travel to Los Angeles, California, from Saturday, March 4, 2006 through Monday, March 6, 2006.

Dated: February <u>16</u>, 2006

EDWARD TORPOCO
Assistant United States Attorney

To: BAIAN H GZTZ.



OF CALIFORNIA

CONTINUING EDUCATION SEMINAR
ALL DRIVING SCHOOLS AND TRAFFIC SCHOOLS
TO OBTAIN YOUR REGISTRATION FORM—LOG ON TO:
WWW.DSAC.COM

IF YOU DO NOT HAVE INTERNET ACCESS CALL (530) 885-8109 AND REQUEST A REGISTRATION FORM.

WE CAN FAX OR MAIL YOU A FORM.

WHEN: SUNDAY-MARCH 5, 2006

TIME: 8:00 AM TO 4:00 PM Registration Starts: 7:15 AM

WHERE:

SPORTSMAN'S LODGE 12833 Ventura Blvd Studio City, CA 94604 (818) 755-5000

Registration form and check payable to DSAC must be RECEIVED BY February 24, 2006 IF YOU HAVE ALREADY REGISTERED—PLEASE, DISREGARD THIS NOTICE.

NO EXCEPTIONS—Add a \$25,00 fee at the door. LUNCH: \$20.00 Prepaid

Any Seminar Questions call: Shelly Collins (530) 885-8109 Fax (530)885-4605 Mail Seminar Registration to: Shelly Collins—PO Box 6330—Auburn, CA 95604



ORDER The Court having considered the Application submitted to permit defendant Sandy Ru Zhong to travel to Los Angeles, California, and good cause appearing, IT IS HEREBY ORDERED that Defendant Sandy Ru Zhong may travel to Los Angeles, California, from Saturday March 4, 2006 through Monday, March 6, 2006. THE HONORABLE MARILYN HALL PATEL United States District Court Judge